

**Annual 47 C.F.R. § 64.2009(e) CPNI Certification Template****EB Docket 06-36**

Annual 64.2009(e) CPNI Certification for [2015] covering the prior calendar year [2014]

1. Date filed: 2/26/2015
2. Name of company(s) covered by this certification: *Westelcom Network Inc.*
3. Form 499 Filer ID: 820896
4. Name of signatory: James P. Forcier
5. Title of signatory: CEO
6. Certification:

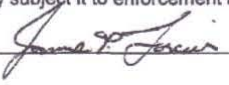
I, James P. Forcier, certify that I am an officer of the company named above, and acting as an agent of the company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. See 47 C.F.R. § 64.2001 *et seq.*

Attached to this certification is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements (including those mandating the adoption of CPNI procedures, training, safeguards, recordkeeping, and supervisory review) set forth in section 64.2001 *et seq.* of the Commission's rules.

The company *has not* taken actions (*i.e.*, proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission against data brokers) against data brokers in the past year. [NOTE: If you reply in the affirmative, provide an explanation of any actions taken against data brokers.]

The company *has not* received customer complaints in the past year concerning the unauthorized release of CPNI [NOTE: If you reply in the affirmative, provide a summary of such complaints. This summary must include the number of complaints, broken down by category or complaint, *e.g.*, instances of improper access by employees, instances of improper disclosure to individuals not authorized to receive the information, or instances of improper access to online information by individuals not authorized to view the information.]

The company represents and warrants that the above certification is consistent with 47 C.F.R. § 1.17, which requires truthful and accurate statements to the Commission. The company also acknowledges that false statements and misrepresentations to the Commission are punishable under Title 18 of the U.S. Code and may subject it to enforcement action.

Signed  [Signature of an officer, as agent of the carrier]

**Attachments:** Accompanying Statement explaining CPNI procedures  
Explanation of actions taken against data brokers (if applicable)  
Summary of customer complaints (if applicable)

Westelcom Network, Inc.

Address: 2 Champlain Ave  
Westport, NY 12993

#### STATEMENT

Westelcom Network, Inc. has established operating procedures that ensure compliance with the Federal Communication Commission ("Commission") regulations regarding the protection of customer proprietary network information ("CPNI").

- Westelcom Network, Inc. has implemented procedures whereby the status of a customer's CPNI approval can be determined prior to the use of CPNI.
- Westelcom Network, Inc. continually educates and trains its employees regarding the appropriate use of CPNI. Westelcom Network, Inc. has established disciplinary procedures should an employee violate the CPNI procedures established by Westelcom Network, Inc.
- Westelcom Network, Inc. maintains a record of its and its affiliates' sales and marketing campaigns that use its customers' CPNI. Westelcom Network, Inc. also maintains a record of any and all instances where CPNI was disclosed or provided to third parties, or where third parties were allowed access to CPNI. The record includes a description of each campaign, the specific CPNI that was used in the campaign, and what products and services were offered as a part of the campaign.
- Westelcom Network, Inc. has established a supervisory review process regarding compliance with the CPNI rules with respect to outbound marketing situations and maintains records of Westelcom Network, Inc. compliance for a minimum period of one year. Specifically, Westelcom Network, Inc.'s sales personnel obtain supervisory approval of any proposed outbound marketing request for customer approval regarding its CPNI, and a process ensures that opt-out elections are recorded and followed.

- Westelcom Network, Inc. took the following actions against data brokers in 2014, including proceedings instituted or petitions filed by Westelcom Network, Inc. at a state commission, in the court system, or at the Federal Communications Commission: No Actions needed against Data Brokers in 2014.
- Westelcom Network, Inc. takes the following steps to protect against pretexting and to protect CPNI:
  - All customers are authenticated, either by password, back up question or valid Photo ID.
  - If authentication is not possible, the service representative calls the customer back at the telephone number of record, or suggests the customer come into the local business office with a valid photo ID or CPNI information is mailed to the customer at the address of record.
- The following is a summary of all customer complaints received in 2014 regarding the unauthorized release of CPNI:
  - Number of customer complaints Westelcom Network, Inc. received in 2014 related to unauthorized access to CPNI, or unauthorized disclosure of CPNI: There were NO complaints in 2014.
  - Category of complaint:
    - \_0\_ Number of instances of improper access by employees
    - \_0\_ Number of instances of improper disclosure to individuals not authorized to receive the information
    - \_0\_ Number of instances of improper access to online information by individuals not authorized to view the information
    - \_0\_ Number of other instances of improper access or disclosure
  - Description of instances of customer complaints, improper access or disclosure: None.